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FEB - 7 2014
FCC Mail Room

Feb. 7, 2014

VIA FEDEX

Marlene Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> St. S.W. Washington, DC 20554

Re: CPNI Certification, EB 06-36

Dear Ms. Dortch:

On behalf of CitiBroadband Wireless, Inc., enclosed please find the company's annual CPNI certification for filing in the above-referenced docket. Please contact me at (732) 508-2221 if you any questions regarding this filing.

Respectfully Submitted,

Ingrid Mullins Executive Assistant CitiBroadband Wireless, Inc.

Attachment

Cc: Best Copy and Printing (via e-mail)

## Annual 47 C.F.R.S: 64.2009(e) CPNI Certification Template

## FCC Mail Room

#### **EB OCKET 06-36**

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year of 2013

1. Date filed: March 1, 2014

2. Name of company(s) covered by this certification: CitiBroadband Wireless, Inc.

3. Form 499 Filer ID: 828384

4. Name of signatory: Jesse E. Russell

5. Title of signatory: Chief Executive Officer

6. Certification:

I, Jesse E. Russell, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps accompanies are taking to protect CPNI.

The company has received any customer complaints in the past year concerning the unauthorized release of CPNI (number of the customer complains a company has received related to unauthorized access to CPNI or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

The company represents and warrants that the above certification is consistent with 47. C.F.R. S: 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to the enforcement action.

Signed

Jesse E. Russell

Attachments: Accompanying Statement explaining CPNI procedures

# CitiBroadband Wireless, Inc. Statement of CPNI Operating Procedures

FCC Mail Room

CitiBroadband Wireless, Inc. ("CitiBroadband") did not provide service in 2011; however, CitiBroadband has established policies and procedures to comply with the Federal Communications Commission's ("FCC's") rules regarding the use, disclosure, and access to customer proprietary network information ("CPNI") in accordance with §64.2001 et seq. of the Commission's rules, 47 C.F.R. §64.2001 et seq. This statement is a summary of CitiBroadband's policies and procedures designed to safeguard CPNI.

CitiBroadband has substantial processes and control for both physical security and access to data. Its customers will be provided services under contracts with express confidentiality provisions, verification methods to confirm the identity of customer's authorized persons to receive the customer's CPNI. Business customer will have dedicated account representatives with access to customer data. CitiBroadband will maintain and utilize CPNI for the limited purposes of initiating, rendering billing and collecting of its services, and may use CPNI, if necessary, to protect its property rights. CitiBroadband will not use any CPNI for any marketing purposes, nor will CitiBroadband disclose CNPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

CitiBroadband has implemented measures to discover and to protect against unauthorized attempts to access CPNI. CitiBroadband has also implemented measure to discover and to protect against unauthorized attempts to access CPNI. In addition, CitiBroadband has implemented procedures pursuant to which it will track breaches of CPNI, and it will notify the United States Secret Service and the Federal Bureau of Investigation. CitiBroadband will notify its customers of the security breach, if permitted, and will notify of the breaches and notifications for a two-year period. CitiBroadband will track customer complaints regarding CPNI.

CitiBroadband will train its employees as to when they are and are not permitted to use, permitted access to, or permitted to disclose CPNI. CitiBroadband will institute a disciplinary process in place to address any noncompliance with its policies, including policies regarding CPNI, which includes the potential for termination.

CitiBroadband will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.